

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

LA UNIÓN DEL PUEBLO ENTERO, et al.,
Plaintiffs,

v.

GREGORY W. ABBOTT, et al.,
Defendants.

5:21-cv-844-XR

LULAC TEXAS, et al.,

Plaintiffs,

v.

JANE NELSON, et al.,
Defendants.

1:21-cv-0786-XR

LULAC PLAINTIFFS' OBJECTIONS TO DEFENDANTS' RULE 26(A)(3) DISCLOSURES

Plaintiffs LULAC Texas ("LULAC"), Texas Alliance for Retired Americans ("TARA"), Texas AFT ("AFT"), and Voto Latino (collectively "LULAC Plaintiffs"), pursuant to the Court's March 30, 2023 Second Amended Scheduling Order (ECF No. 579), the Parties' Advisory Extending the Deadline to File Responses and Objections to Rule 26(a)(3) Pretrial Disclosures (ECF No. 699), and Rule 26(a)(3) of the Federal Rules of Civil Procedure, hereby submit their objections to Defendants'¹ pretrial disclosures:

¹ LULAC Plaintiffs respond to the pretrial disclosures of Intervenor-Defendants Harris County Republican Party, Dallas County Republican Party, Republican National Committee, National Republican Senatorial Committee, and National Republican Congressional Committee (ECF No. 677), Harris County District Attorney Kim Ogg (ECF No. 681), and Defendants Gregory W. Abbott, in his official capacity as Governor of Texas, Jane Nelson, in her official capacity as Secretary of State, Angela Colmenero, in her official capacity as Provisional Attorney General of Texas, and the State of Texas (ECF No. 688) (collectively, "Defendants").

- LULAC Plaintiffs' Objections to Defendants' Exhibit Lists are reflected in Table A below; and
- LULAC Plaintiffs' Objections and Counter Designations to Defendants' Deposition Designations are reflected in Table B below.

LULAC Plaintiffs incorporate by reference all objections and counter deposition testimony designated by all other private Plaintiffs to this action, Plaintiff United States, Defendants, and Defendant-Intervenors. LULAC Plaintiffs reserve the right to amend their objections and counter deposition testimony designations.

Unless otherwise noted, the list below provides a key for the objections set forth in Tables A and B:

Code	Objection
ARG	Lawyer Argument or Colloquy. LULAC Plaintiffs object because the evidence constitutes a lawyer's argument and not testimony of the witness.
BER	Best Evidence Rule. LULAC Plaintiffs object to the extent Defendants seek to use the proposed evidence to prove the contents of an original writing. Fed. R. Evid. 1002.
F	Foundation. LULAC Plaintiffs object because the foundation necessary for admitting the evidence has not been provided. Fed. R. Evid. 901.
H	Hearsay. LULAC Plaintiffs object because the evidence constitutes or contains inadmissible hearsay. Fed. R. Evid. 802.
INC	Remainder of or Related Writings or Recorded Statements. LULAC Plaintiffs object because the evidence is incomplete, or it asks the witness to offer testimony on a document where the remainder of the document should fairly be considered. Fed. R. Evid. 106.
IO	Improper Opinion. LULAC Plaintiffs object because the testimony seeks improper opinion testimony. Fed. R. Evid. 701-702.
LC	Calls for Legal Conclusion. LULAC Plaintiffs object because the evidence contains improper conclusions of law.
PK	Personal Knowledge. LULAC Plaintiffs object because the evidence introduced is insufficient to support a finding that the witness has personal knowledge of the matter. Fed. R. Evid. 602.

R	Relevance. LULAC Plaintiffs object because the evidence is not relevant to any issue to be decided in this case. Fed. R. Evid. 401-402.
RTR	Reserve the Right to Object. LULAC Plaintiffs do not presently object to the evidence being introduced but reserve the right to object at a later date if Defendants use the evidence for an improper purpose.
VA	Vague or Ambiguous. LULAC Plaintiffs object because the evidence includes vague and indefinite statements.

TABLE A – LULAC PLAINTIFFS’ OBJECTIONS TO DEFENDANTS’ EXHIBIT LIST²		
Def Ex No.	Description	LULAC Pls’ Objection
State Def. Ex. No. 13	Election Advisory No. 2021-18, Re: Revised: March 1, 2022, Primary Election and May 24, 2022, Primary Runoff Election Law Calendar, dated November 12, 2021. (STATE097860–908)	RTR
State Def. Ex. No. 14	Election Advisory No. 2021-21, Re: Legislative Summary – Second and Third Special Sessions, dated November 19, 2021. (STATE001483–502)	RTR
State Def. Ex. No. 15	Election Advisory No. 2021-23, Re: May 7, 2022, Election Law Calendar, dated December 10, 2021. (STATE097909–48)	RTR
State Def. Ex. No. 16	Election Advisory No. 2022-07, Re: NEW LAW: Changes to Early Voting by Personal Appearance – House Bill 2025, House Bill 3107, and Senate Bill 1, dated January 21, 2022. (STATE001577–93)	RTR
State Def. Ex. No. 17	Election Advisory No. 2022-08, Re: NEW LAW: Senate Bill 1 – Opportunity to Correct Defects on Application for a Ballot by Mail and Carrier Envelope, dated November 19, 2021. (STATE034294–321)	RTR
State Def. Ex. No. 18	Election Advisory No. 2022-09, NEW LAW: Changes to Poll Watcher Requirements Under House Bill 3107 and Senate Bill 1, dated February 4, 2022. (STATE060559)	RTR
State Def. Ex. No. 19	Election Advisory No. 2022-12, Re: Additional Procedures Regarding Correction of Defects on Application for Ballot by Mail or Carrier Envelope, dated February 11, 2022. (STATE001469–73)	RTR
State Def. Ex. No. 20	Election Advisory No. 2022-18, Re: Additional Ballot by Mail Procedures for May Uniform Election and Primary Runoff Election, dated April 26, 2022. (STATE087955–58)	RTR
State Def. Ex. No. 21	Election Advisory No. 2022-25, Re: November 8, 2022, Election Law Calendar, dated June 20, 2022, dated June 20, 2022. (STATE122992–3039)	RTR

² LULAC Plaintiffs do not object to the admission of State Defendants’ expert reports at State Defendants’ Exs. Nos. 1-12 to the extent that Plaintiffs’ expert reports in this consolidated case are also admitted for use at trial.

Def Ex No.	Description	LULAC Pls' Objection
State Def. Ex. No. 22	Spreadsheet created by Secretary of State in response to media inquiries, listing mail-ballot rejection rates for 2022 elections. (STATE115581-616)	F, H
State Def. Ex. No. 23	Final Report on Audit of 2020 General Election in Texas. (STATE115222-580)	H, F
State Def. Ex. No. 24	Executive Summary to Audit 2020 General Election in Texas (STATE115212-221)	H, F
State Def. Ex. No. 29	Draft of Poll Watcher Online Training, Secretary of State, January 20, 2022 (STATE035175-90)	RTR
State Def. Ex. No. 67	January 18, 2022, Email from Election Security Trainer Alexa Buxkemper to Legal Director Christina Adkins, Re: How many forms (STATE033331-32)	H
State Def. Ex. No. 80	Carrier Envelope Insert utilized by Kleberg County to remind voters of ID number requirement. (STATE142722)	R, F, H
State Def. Ex. No. 83	CONFIDENTIAL Instances of Suspected Illegal Voting Since March 1, 2018 – Cases Opened, Office of the Attorney General. (STATE112155-57)	F, H
State Def. Ex. No. 84	CONFIDENTIAL Case Tracking Spreadsheet, Election Integrity Unit, Office of the Attorney General. (STATE112158-59)	F, H
State Def. Ex. No. 85	2020 Complaint Log, Secretary of State (STATE078234)	F, H
State Def. Ex. No. 86	2016-2019 Complaint Log, Secretary of State (STATE078237)	F, H
State Def. Ex. No. 87	Election Fraud Complaints Referred for Investigation: SOS Referrals, updated May 10, 2022. (STATE107717-32)	F, H
State Def. Ex. No. 89	Power Point Presentation, <i>Election Integrity</i> . (STATE054622-77)	RTR
State Def. Ex. No. 90	Indictment, <i>Texas v. Ward</i> , Cause No. 50947-B (STATE098012-14)	H
State Def. Ex. No. 91	Indictment, <i>Texas v. Jackson</i> , Cause No. 50949-B (STATE097980-98000)	H
State Def. Ex. No. 92	Indictment, <i>Texas v. Burns</i> , Cause No. 50951-B (STATE098008-11)	H
State Def. Ex. No. 93	Indictment, <i>Texas v. Brown</i> , Cause No. 50953-B (STATE098001-07)	H
State Def. Ex. No. 94	Indictment, <i>Texas v. Molina</i> , W-19-0134-J22. (STATE098413-18)	H

Def Ex No.	Description	LULAC Pls' Objection
State Def. Ex. No. 95	Indictment, <i>United States v. Orelllana</i> , Case No. 9:18-cr-00020 (STATE098510-15)	H
State Def. Ex. No. 96	Judgment in a Criminal Case, <i>United States v. Orelllana</i> , Case No. 9:18-cr-00020 (STATE098516-22)	H
State Def. Ex. No. 97	Plea Agreement, <i>United States v. Orelllana</i> , Case No. 9:18-cr-00020 (STATE098523-32)	H
State Def. Ex. No. 98	Warrant of Arrest, <i>Texas v. Molina</i> , W-19-0134-J22. (STATE098537-44)	R, H
State Def. Ex. No. 99	Agreement, OAG Prosecution Diversion Program, related to illegal voting, signed March 8, 2022. (STATE087320)	H, R
State Def. Ex. No. 100	Agreement, OAG Prosecution Diversion Program, related to unlawful assistance, signed June 6, 2018. (STATE087340)	H, R
State Def. Ex. No. 101	Agreement, OAG Prosecution Diversion Program, related to illegal voting and false information on government record, signed October 28, 2021. (STATE087342)	H, R
State Def. Ex. No. 102	Agreement, OAG Prosecution Diversion Program, related to illegal voting and false information on government record, signed August 14, 2020. (STATE087345)	H, R
State Def. Ex. No. 103	Agreement, OAG Prosecution Diversion Program, related to illegal voting and false information on government record, signed August 19, 2020. (STATE087360)	H, R
State Def. Ex. No. 104	Agreement, OAG Prosecution Diversion Program, related to illegal voting and false information on government record, signed June 5, 2018. (STATE087365)	H, R
State Def. Ex. No. 105	Agreement, OAG Prosecution Diversion Program, related to unlawful assistance, signed June 15, 2018. (STATE087341)	H, R
State Def. Ex. No. 106	Agreement, OAG Prosecution Diversion Program, related to failure to sign application as a witness, signed May 19, 2021. (STATE087373)	H, R
State Def. Ex. No. 107	Agreement, OAG Prosecution Diversion Program, related to violations of Tex. Elec. Code §§ 64.012 and 276.013, signed August 5, 2019. (STATE087375)	H, R
State Def. Ex. No. 108	Agreement, OAG Prosecution Diversion Program, related to false information on application for ballot by mail, signed June 26, 2018. (STATE087376)	H, R
State Def. Ex. No. 109	Agreement, OAG Prosecution Diversion Program, related to false information on application for ballot by mail, signed June 25, 2018. (STATE087377)	H, R

Def Ex No.	Description	LULAC Pls' Objection
State Def. Ex. No. 110	Agreement, OAG Prosecution Diversion Program, related to false information on application for ballot by mail, signed June 25, 2018. (STATE087380)	H, R
State Def. Ex. No. 111	Agreement, OAG Prosecution Diversion Program, related to illegal voting and false information on application for ballot by mail, signed July 25, 2018. (STATE087381)	H, R
State Def. Ex. No. 112	Agreement, OAG Prosecution Diversion Program, related to illegal voting and false information on application for ballot by mail, signed July 25, 2018. (STATE087381)	H, R
State Def. Ex. No. 113	Agreement, OAG Prosecution Diversion Program, related to false information on application for ballot by mail, signed September 17, 2018. (STATE087386)	H, R
State Def. Ex. No. 114	Agreement, OAG Prosecution Diversion Program, related to false information on application for ballot by mail, signed June 26, 2018. (STATE087391)	H, R
State Def. Ex. No. 115	Agreement, OAG Prosecution Diversion Program, related to false information on application for ballot by mail, signed June 26, 2018. (STATE087392)	H, R
State Def. Ex. No. 116	Agreement, OAG Prosecution Diversion Program, related to false information on application for ballot by mail, signed June 26, 2018. (STATE087393)	H, R
State Def. Ex. No. 117	Final Judgment, <i>Rangle v. Rodriguez</i> , NO. 2022CVK001669D1 (49th Dist. Ct., Webb County, Feb. 2, 2023) (STATE184628–37)	H
State Def. Ex. No. 118	United States' Responses to Texas's First Set of RFPs – Privilege Log (Exhibit 10 – May 9, 2022, Dep. of Remi Garza)	H
State Def. Ex. No. 119	November 4, 2013, Press Release from FBI San Antonio Field Office, Re: Former Cameron County Woman Convicted of Voter Fraud. (STATE107789)	F, H
State Def. Ex. No. 120	June 5, 2014, Press Release from Department of Justice U.S. Attorney's Office Southern District of Texas, Re: Campaign Worker Pleads Guilty To Buying Votes In Donna School Board Election. (STATE107844–45)	H, R
State Def. Ex. No. 121	June 19, 2014, Press Release from Department of Justice, Re: Campaign Manager Charged with Buying Votes in a Donna, Texas, School Board Election. (STATE097645–46)	H, R
State Def. Ex. No. 122	December 1, 2014, Press Release from FBI San Antonio Field Office, Re: Campaign Manager Pleads Guilty to Conspiracy to Buy Votes in a Donna, Texas School Board Election. (STATE107785)	F, H, R
State Def. Ex. No. 123	House Journal, Eightieth Legislature, Regular Session, Sixtieth Day – Monday April 23, 2007. (STATE098214–75)	R, F, H

Def Ex No.	Description	LULAC Pls' Objection
State Def. Ex. No. 124	Transcript of Texas Senate Committee on State Affairs, March 18, 2019, Hearing, Re: Senate Bill 9. (STATE098545–658)	R, H
State Def. Ex. No. 125	December 3, 2018, Letter from Senator Judith Zaffirini to Senator Bryan Hughes regarding Senate Select Committee on Election Security. (STATE108349–50)	R, H
State Def. Ex. No. 126	Chuck DeVore, <i>The Role of Voter List Maintenance and Voter Identification in Election Integrity</i> , Texas Public Policy Foundation, March 2021. (TXLEG_0001066)	F, R, H
State Def. Ex. No. 127	July 22, 2020, Letter from Harris County Clerk Chris Hollins to Governor Greg Abbott, Re: Extended Early Voting Days for November 2020 Election. (STATE098283)	R, F
State Def. Ex. No. 128	Governor's Proclamation, dated July 27, 2020, suspending certain statutes concerning elections on November 3, 2020. (STATE098533–36)	R
State Def. Ex. No. 129	Governor Proclamation, dated October 1, 2020, suspending certain statutes concerning the November 3, 2020, elections. (Exhibit 3 – May 6, 2022, Dep. of Chris Hollins)	R
State Def. Ex. No. 130	Complaint, ECF 1, <i>Tex. League of United Latin Am. Citizens v. Abbott</i> , 493 F. Supp. 3d 548, 567 (W.D. Tex. 2020), vacated sub nom. <i>Tex. League of United Latin Am. Citizens v. Hughs</i> , No. 20-50867, 2021 WL 1446828 (5th Cir. Feb. 22, 2021). (Exhibit 4– May 6, 2022, Dep. of Chris Hollins)	R
State Def. Ex. No. 131	Justice Devine Dissent, <i>In re Hotze</i> , et al, No. 20-0751, 627 S.W.3d 652 (Tex. 2020). (Exhibit 13 – October 6, 2022, Dep. of Sen. Carol Alvarado)	R
State Def. Ex. No. 133	August 27, 2020, Letter from Director of Elections Keith Ingram to Harris County Clerk Chris Hollins about unsolicited ABBMs. (Exhibit 3 – October 6, 2022, Dep. of Sen. Carol Alvarado)	H, PK, IO
State Def. Ex. No. 134	Petition, <i>State v. Hollins</i> , NO. 14-20-00627- CV (127th Dist. Ct., Harris County, Tex. Aug. 31, 2020). (Exhibit 7 – May 6, 2022, Dep. of Chris Hollins)	H, R
State Def. Ex. No. 138	October 16, 2020, Letter from Attorney General Ken Paxton to Texas Election Officials about drive-thru voting. (Exhibit 7– October 6, 2022, Dep. of Sen. Carol Alvarado)	RTR
State Def. Ex. No. 140	Justice Devine Dissent, <i>In re Hotze</i> , et al, No. 20-0819, 610 S.W.3d 909 (Tex. 2020). (STATE098278–82)	H, LC, R
State Def. Ex. No. 143	September 10, 2020, Email from Elections Division Attorney Charles Pinney to Assistant Director Dan Hayes, Re: Travis County Central Count Accommodations for Poll Watchers. (STATE092408–09)	H

Def Ex No.	Description	LULAC Pls' Objection
State Def. Ex. No. 145	Emergency Petition for Writ of Mandamus, <i>In re Mackowiak, et al</i> , No. 20-0889 (Tex. 2020). (STATE098659-724)	H, LC, PK, R
State Def. Ex. No. 146	Brief of the Texas Attorney General, <i>In re Mackowiak, et al</i> , No. 20-0889 (Tex. 2020). (STATE097484-90)	H, LC, PK, R
State Def. Ex. No. 147	Rule 11 Agreement between Relators and Respondent, <i>In re Mackowiak, et al</i> , No. 20-0889 (Tex. 2020). (STATE097978-79)	H
State Def. Ex. No. 148	November 11, 2020, Press Release, <i>Travis County Candidate Settles with Travis County Clerk</i> , Martin Harry for District Attorney. (STATE098419)	RTR
State Def. Ex. No. 149	December 8, 2022, Letter from Harris County Election Administrator Clifford Tatum to Secretary of State John Scott, about Countywide Polling Place Program. (STATE122932-36)	R
State Def. Ex. No. 174	2020-2021 Voting Assistance Guide, Texas (STATE115160-75)	RTR
State Def. Ex. No. 175	2022-2023 Voting Assistance Guide, Alabama (STATE115060-65)	R
State Def. Ex. No. 176	2022-2023 Voting Assistance Guide, Georgia (STATE115074-85)	R
State Def. Ex. No. 177	2022-2023 Voting Assistance Guide, Florida (STATE115066-73)	R
State Def. Ex. No. 178	2022-2023 Voting Assistance Guide, Hawaii (STATE115086-91)	R
State Def. Ex. No. 179	2022-2023 Voting Assistance Guide, Louisiana (STATE115092-99)	R
State Def. Ex. No. 180	2022-2023 Voting Assistance Guide, Mississippi (STATE115100-07)	R
State Def. Ex. No. 181	2022-2023 Voting Assistance Guide, New Jersey (STATE115108-13)	R
State Def. Ex. No. 182	2022-2023 Voting Assistance Guide, New Mexico (STATE115114-19)	R
State Def. Ex. No. 183	2022-2023 Voting Assistance Guide, North Carolina (STATE115120-29)	R
State Def. Ex. No. 184	2022-2023 Voting Assistance Guide, North Dakota (STATE115130-35)	R
State Def. Ex. No. 185	2022-2023 Voting Assistance Guide, Pennsylvania (STATE115136-43)	R

Def Ex No.	Description	LULAC Pls' Objection
State Def. Ex. No. 186	2022-2023 Voting Assistance Guide, South Dakota (STATE115144–51)	R
State Def. Ex. No. 187	2022-2023 Voting Assistance Guide, Tennessee (STATE115152–59)	R
State Def. Ex. No. 188	2022-2023 Voting Assistance Guide, Texas (STATE115176–91)	RTR
State Def. Ex. No. 189	2022-2023 Voting Assistance Guide, Virginia (STATE115192–203)	R
State Def. Ex. No. 190	2022-2023 Voting Assistance Guide, West Virginia (STATE115204–209)	R
State Def. Ex. No. 191	Webpage, <i>State Laws Governing Early Voting</i> , NATIONAL CONFERENCE OF STATE LEGISLATURES (Aug. 8, 2019). (Exhibit 1 – May 2, 2022, Dep. of Dana DeBeauvoir)	H, R, F
State Def. Ex. No. 194	Enrolled version of House Bill 3159. An Act Relating to the Use of an Accessible Absentee Mail System by Certain Voters, H.B. 3159, 88th Leg., R.S. (2023) (STATE182586–91)	R
State Def. Ex. No. 198	Enrolled version of Senate Bill 477. An Act Relating to Accommodating Voters with a Disability, S.B. 477, 88th Leg., R.S. (2023) (STATE182774–78)	R
State Def. Ex. No. 202	Election Advisory No. 2022-13, Certain Activities in Vicinity of Polling Places, dated February 14, 2022. (STATE001463–67)	R
State Def. Ex. No. 203	Election Advisory No. 2022-02, Instructions and Deadlines for Mailing/Emailing Ballots Under the Federal “MOVE Act” for Overseas Voters, dated January 10, 2022. (STATE124074–79)	R
State Def. Ex. No. 204	Election Advisory No. 2021-14, Re: Impact of Redistricting on Certain Election Deadlines and Procedures, dated November 1, 2021. (STATE001477–82)	R
State Def. Ex. No. 205	Election Advisory No. 2021-10, Re: NEW LAW: SB 1111 (2021, Regular Session) Address Confirmation Process and Forms, dated August 31, 2021. (STATE098870–72)	R
State Def. Ex. No. 206	Election Advisory No. 2021-09, Re: 2021 Legislative Summary – 87 th Regular Session, dated July 30, 2021. (STATE098864–69)	R
State Def. Ex. No. 207	Election Advisory No. 2021-08, Re: November 2, 2021, Election Law Calendar – Last Updated: June 2021. (STATE097826–859)	R
State Def. Ex. No. 208	Election Advisory No. 2020-27, Re: Minority Language Requirements, dated September 7, 2020. (STATE097824–25)	R
State Def. Ex. No. 209	Election Advisory No. 2020-17, Re: November 3, 2020, Election Law Calendar – Updated August 2020. (STATE097791–823)	R

Def Ex No.	Description	LULAC Pls' Objection
State Def. Ex. No. 210	Election Advisory No. 2019-09, Re: Minority Language Requirements, dated June 25, 2019. (STATE097788)	R
State Def. Ex. No. 212	Form 5-16, Application for Emergency Early Voting Ballot due to Death in the Family, January 2022. (STATE138843-44)	R
State Def. Ex. No. 214	Instructions for Form 5-18, Application for Emergency Early Voting Ballot Due to Sickness or Physical Disability, January 2022 (STATE138054)	R
State Def. Ex. No. 215	Form 5-19, Application for Emergency Early Voting Ballot Board Due to Sickness of Physical Disability: Instructions for Voter after Marking the Ballot, January 2022 (STATE138171)	R
State Def. Ex. No. 219	September 27, 2022, Email from Director of Elections Keith Ingram to Joyce LeBombard, League of Women Voters, Re: Two More Quick Questions. (STATE140777-79)	RTR
State Def. Ex. No. 220	December 9, 2021, Email from Deputy Director J. Scott Wiedmann, Federal Voting Assistance Program, to Legal Director Christina Adkins, Re: RE: [Non- DoD Source] Questions on Carrier Envelopes for FPCA voters. (STATE031889-90)	R
State Def. Ex. No. 221	February 1, 2022, Email from Elections Division Attorney Melanie Best and Christina Obermiller, Department of Defense, Federal Voting Assistance Program, Re: FPCA ID Question -FVAP/Obermiller. (STATE04893-94)	H
State Def. Ex. No. 244	Power Point Presentation, <i>Communicating Legislative Changes: ID Requirements for Voting by Mail</i> , NASED Presentation, Secretary of State, February 2023. (STATE177246-68)	BER, RTR
State Def. Ex. No. 245	Power Point Presentation, <i>SOS Updates 2021</i> , Secretary of State. (STATE075498-527)	RTR
State Def. Ex. No. 246	Power Point Presentation, <i>Elections 101</i> , Secretary of State, July 2020. (STATE085183-232)	RTR
State Def. Ex. No. 247	Power Point Presentation, <i>Early Voting in Person Changes</i> , Secretary of State (RFP14_000071)	RTR
State Def. Ex. No. 248	Power Point Presentation, FAQs on Applications for Ballot by Mail (ABBMs), Secretary of State. (STATE061321-24)	RTR
State Def. Ex. No. 249	Power Point Presentation, <i>Election Reconciliation-Official Totals</i> , Webinar, Secretary of State, March 2022. (STATE019553-72)	RTR
State Def. Ex. No. 250	Power Point Presentation, <i>Election Reconciliation Forms</i> , Webinar, Secretary of State, April 2022. (STATE087830-66)	RTR
State Def. Ex. No. 251	Power Point Presentation, <i>Election Reconciliation Forms</i> , Webinar, Secretary of State, October 2022. (STATE112370-414)	RTR

Def Ex No.	Description	LULAC Pls' Objection
State Def. Ex. No. 252	Power Point Presentation, <i>Opportunity to Correct Defects on Application for Ballot by Mail and Carrier Envelope</i> , Secretary of State, February 2022. (STATE059522–557)	RTR
State Def. Ex. No. 253	Power Point Presentation, <i>Training for EVBB/SVC Members on New Ballot by Mail Procedures</i> , Secretary of State, April 2022 (STATE124844–94)	RTR
State Def. Ex. No. 254	Power Point Presentation, <i>Update from SOS</i> , Secretary of State, August 2022 (STATE111746–83)	RTR
State Def. Ex. No. 255	Power Point Presentation, <i>Training for EVBB/SVC Members on New Ballot by Mail Procedures: General Election for State and County Officers</i> , Secretary of State, October 2022 (STATE124640–65)	RTR
State Def. Ex. No. 256	Power Point Presentation, <i>Proactive Communication Strategies for Local Election Officials</i> , Secretary of State, Election Seminar, Secretary of State, November 2022. (STATE148646–70)	H
State Def. Ex. No. 257	Power Point Presentation, <i>Election Forms</i> , Election Seminar, Secretary of State, December 2022. (STATE114273–351)	RTR
State Def. Ex. No. 258	Online Poll Worker Training Program, Secretary of State, January 6, 2016 (STATE081477–98)	RTR
State Def. Ex. No. 273	Preliminary Election Reconciliation – Unofficial Totals for March 1, 2022, Primary Elections, Harris County (Exhibit 7 – April 20, 2022, Dep. of Isabel Longoria)	R
State Def. Ex. No. 274	Election Reconciliation Form for March 1, 2022, Democratic Primary Election, Harris County (Exhibit 8 – April 20, 2022, Dep. of Isabel Longoria)	R
State Def. Ex. No. 275	Election Reconciliation Form for March 1, 2022, Republican Primary Election, Harris County (Exhibit 9 – April 20, 2022, Dep. of Isabel Longoria)	R
State Def. Ex. No. 276	Election Reconciliation Form for November 8, 2022, General Election, Harris County (Tatum_005330)	R
State Def. Ex. No. 277	Election Reconciliation Form for November 8, 2022, General Election, Harris County (STATE170229)	R
State Def. Ex. No. 282	Declaration of Brian Keith Ingram, ECF 43-1, <i>Tex. League of United Latin Am. Citizens v. Abbott</i> , 493 F. Supp. 3d 548, 567 (W.D. Tex. 2020), vacated sub nom. <i>Tex. League of United Latin Am. Citizens v. Hughs</i> , No. 20-50867, 2021 WL 1446828 (5th Cir. Feb. 22, 2021). (STATE098337–40)	BER, R, RTR
State Def. Ex. No. 283	Reporters Record, Vol. 2 of 3, October 13, 2020, Hearing on Plaintiff's Application for Temporary Injunction and Defendants Plea to the Jurisdiction, <i>Anti-Defamation League Austin, Southwest, and Texoma Regions v. Abbott</i> , Cause No. D-1-GH-20-005550. (STATE098977–275)	R, H, LC

Def Ex No.	Description	LULAC Pls' Objection
State Def. Ex. No. 284	Appellant's Brief, <i>Abbott v. Anti-Defamation League Austin, Southwest, and Texoma Regions</i> , Appellate Cause No. 03-20-00498- CV, 2020 WL 6586318 (Tex. App.—Austin). (STATE097491–600)	BER, R, H, LC
State Def. Ex. No. 285	Appellant's Reply Brief, <i>Abbott v. Anti-Defamation League Austin, Southwest, and Texoma Regions</i> , Appellate Cause No. 03- 20-00498- CV (Tex. App.—Austin). (STATE097601–40)	BER, R, H, LC
State Def. Ex. No. 286	Order, ECF 63, <i>Hotze v. Hollins</i> , No. 4:20- CV-03709, (S.D. Tex. Nov. 2, 2020), aff'd in part, vacated in part sub nom. <i>Hotze v. Hudspeth</i> , 16 F.4th 1121 (5th Cir. 2021). (Exhibit 12 – May 6, 2022, Dep. of Chris Hollins)	R
State Def. Ex. No. 287	John Burnett & Marisa Peñaloza, <i>In Rio Grande Valley, Some Campaign Workers Are Paid To Harvest Votes</i> , NPR (July 7, 2015). (STATE107793–808)	H, F
State Def. Ex. No. 288	Tim Acosta, <i>Judge tosses Kleberg County justice of the peace votes, orders new election</i> , CALLER TIMES (June 26, 2018). (STATE107811–13)	R, H, F
State Def. Ex. No. 289	Tim Acosta, <i>Robstown resident pleads guilty to voter fraud, barred from helping in future elections</i> , CALLER TIMES (June 14, 2018). (STATE107836–37)	R, H, F
State Def. Ex. No. 291	Risk for COVID-19 Infection, Hospitalization, and Death by Race/ Ethnicity, CENTER FOR DISEASE CONTROL AND PREVENTION (Apr. 7, 2023), https://www.cdc.gov/coronavirus/2019-ncov/covid-data/investigations-discovery/hospitalization-death-by-race-ethnicity.html . (STATE170541)	R
State Def. Ex. No. 292	Report of the Commission on Federal Election Reform, <i>Building Confidence in U.S. Elections</i> , September 2005. (STATE097647–759)	R, H, F
State Def. Ex. No. 294	Transcript of Texas Senate Committee on State Affairs (Part I), August 9, 2021, Hearing, Re: Senate Bill 1. (STATE154831–77)	F
State Def. Ex. No. 307	Summary Exhibit - ABBM application and ballot numbers-20220325T005810Z-001.zip?ABBM application and ballot numbers\ a_reqexpM22_full.txt (LUPE_0007719)	RTR
State Def. Ex. No. 308	ABBM application and ballot numbers - 20220325T005810Z-001.zip?ABBM application and ballot numbers\ a_reqexpM22_full.txt (LUPE_0007719)	RTR
State Def. Ex. No. 309	Summary Exhibit - REDACTED_- _P322_1_Dallas.xlsx (LUPE_0007734)	RTR
State Def. Ex. No. 310	REDACTED_- _P322_1_Dallas.xlsx (LUPE_0007734)	RTR
State Def. Ex. No. 311	Summary Exhibit - a_reqexpM22_full.txt (LUPE_0024430)	F

Def Ex No.	Description	LULAC Pls' Objection
State Def. Ex. No. 312	a_reqexpPM22_full.txt (LUPE_0024430)	F
State Def. Ex. No. 313	Summary Exhibit - P322_Election.xlsx (HJ_0008945)	F
State Def. Ex. No. 314	P322_Election.xlsx (HJ_0008945)	F
State Def. Ex. No. 315	January 31, 2017, Letter on Results of Audit of November 8, 2016, General Election from Gretchen Nagy, Director, Travis County Voter Registration to Michael Winn, Director, Travis County Clerk Elections Division (383.001691)	R, H, BER

TABLE B – LULAC PLAINTIFFS' OBJECTIONS AND COUNTER DESIGNATIONS TO DEFENDANTS' DEPOSITION DESIGNATIONS			
Deponent and Deposition Date	Def. Designation	LULAC Pls' Objection	LULAC Pls' Counter Designation
Objections and Counter Designations to State Defendants' Designations			
Chris Hollins (May 6, 2022)	18:2–16, 23–25	R	19:6-11
	19:1–5, 12–25	R, ARG	19:6-11
	20:1–4	R	-
	23:22–25	-	24:2-10
	24:1, 11–22	-	24:2-10
	32:1–9	-	32:10-15
	33:15–23	H	32:10-15; 33:24-14
	34:15–25	-	32:10-15; 33:24-14
	35:1–9, 21–25	BER	-
	36:4, 14–25	BER	-
	37:1–4, 19–25	BER	-
	38:1–25	ARG, BER	-
	39:1–9, 16–19, 21–24	LC	-
	44:2–5, 8–25	BER	-
	45:1–10	BER	45:11-46:15
	46:16–25	BER	45:11-46:15
	47:1–12	BER	45:11-46:15
	50:22–25	R	-
	51:1–5, 22–25	R	-
	52:1–25	BER	-
	53:1–25	BER	-
	54:1–5	H, F	-
	61:5–10, 12–25	-	62:6-15
	62:1–5, 16–22, 25	-	62:6-15
	63:1–7, 12–15, 17–25	LC	-
	64:1–25	H	-
	65:1–25	H	-
	66:1–21	LC, H, R	-
	67:1–13, 18–25	F, R	-
	68:1–25	H, R	-

Deponent and Deposition Date	Def. Designation	LULAC Pls' Objection	LULAC Pls' Counter Designation
	69:1-10, 21-24	H, R	-
	70:1-25	H, R	-
	71:1-25	H, R	-
	72:1-4	H, R	72:5-73:1
	73:2-25	H, R	72:5-73:1
	74:2-3, 21-25	H, R	-
	75:1-4	H	-
	76:2-9, 11-25	H	75:7-21
	77:1-19	-	77:20-78:18
	78:19-23	VA, PK	77:20-78:18; 78:24-79:16
	79:17-25	R	-
	80:1-8, 13-22	H, R	-
	81:1-16	H, R	81:17-82:16
	82:17-25	H, R	81:17-82:16
	83:1-25	H, F, LC, R	-
	84:1-14	R	-
	92:4-15, 17-18	-	92:19-25
	93:4-6, 21-25	PK	-
	94:1-16	PK	94:17-95:15
	108:1-8, 23-25	ARG	-
	109:1-2, 8-9, 11-17, 19-20	ARG, IO	-
	110:2-4, 6-8	PK	-
	126:1-8	LC	126:9-25; 169:19-170:20; 171:15-20;
	129:25	PK	-
	130:1, 3-25	PK, IO	132:1-134:24; 149:16-150:10; 151:3-10; 152:4-16; 158:4-12;
	131:1-7	R, IO, LC	-
	144:1-7, 12-22	F, H	-
	145:1-3, 10-25	F, H	-
	146:1-8, 14-25	F, H	-
	147:1-6, 10-1	PK, V	-
Yvonne Ramon (Apr. 21, 2022)	14:1-5, 19-25	R	-
	16:18-25	R	-
	17:1-25	R	-
	20:1-25	R, IO, LC	-
	24:1-6, 14-25	-	24:7-13
	30:1-17, 22-25	R	-
	38:6-10	R	-
	39:1-17	R	39:18-25
	40:1-24	-	39:18-25
	41:22-25	R	-
	42:1-2, 7-25	R	-
	43:1-25	R	-
	44:1-7	R	-
	46:14-24	R	-
	47:15-23	R	-
	49:20-25	R	-
	50:1-6, 10-17	R	-
	51:7-25	R	-

Deponent and Deposition Date	Def. Designation	LULAC Pls' Objection	LULAC Pls' Counter Designation
	52:1-3, 17-25	R	-
	53:6-17, 23-25	R	-
	54:1-13, 18-25	R	54:14-17
	56:1, 5-25	R	-
	60:6-24	R	-
	66:1-24	R	-
	67:14-19	R	-
	68:20-25	LC, IO	-
	69:1-25	LC, IO	-
	70:1-4, 9-25	-	70:5-6
	72:6-25	R	-
	73:1-14	R	-
	74:4-16	R	74:17-21
	75:12-24	R	-
	81:22-25	LC	-
	82:1-25	LC	-
	83:1-15, 20-24	R	83:16-19
	84:1-14	R	83:16-19
	85:12-23	R	-
	86:16-25	R	-
	87:1-8	R	-
	88:18-24	LC	-
	89:15-25	LC	-
	93:12-25	R	-
	94:1-12	R	-
	95:4-23	LC	96:3-97:7
	99:1-25	R	-
	100:1-25	R	-
	101:19-25	LC	-
	102:1-25	LC	-
	103:1	LC	-
	111:21-25	R	-
	112:10-25	R	-
	113:1-23	R	-
	114:17-25	R, VA	115:2-6
	115:1	R, VA	115:2-6
	116:1-16	R	-
	119:22-25	LC	-
	120:1-16	LC	-
	121:9-25	LC	-
	122:1-9	LC	-
	123:17-24	LC	-
	127:11-20	R	-
	129:5-20	R	129:21-25
	131:7-18	R	-
	138:1-14	VA	138:15-139:16
	143:16-25	R	-
	144:1-25	-	145:2-15
	145:1	-	145:2-15
	146:1-4, 11-25	R	146:5-10
	147:1-2, 12-21	R	-

Deponent and Deposition Date	Def. Designation	LULAC Pls' Objection	LULAC Pls' Counter Designation
	150:24-25	R	-
	151:1-25	R	-
	152:1-9	R	-
	153:8-25	R, IO	-
	154:1-25	R, IO	-
	155:1-19	R, IO	155:21-156:3
	167:3-8	R, VA	-
	171:24-25	R	-
	172:1-17	R	-
	173:10-25	R, VA	-
	175:13-18	VA, LC	-
	177:6-15	-	177:16-182:1
	183:13-25	R	-
	184:1-4	R	-
	185:19-25	R	-
	186:1-8	R	-
	208:1-2	VA	-
	225:21-25	-	225:15-20
	226:1-25	VA	-
	227:1-17	R	-
Yvonne Ramon (May 10, 2022)	21:6-25	LC	-
	22:1-25	LC	-
	23:1-12, 23-25	LC	23:13-17
	24:1-25	LC	25:18-26:20, 31:6-10
	25:1-8	R	-
	31:13-25	LC	-
	32:1-25	R	-
	33:1-25	R	-
	34:1-6	R	-
	58:1-25	LC	-
	62:1-25	LC	-
	63:1-25	LC	-
	67:1-25	LC	-
	68:1-25	LC	-
	69:1-8	LC	69:22-70:1
	70:2-20	LC	70:25-71:4
	97:17-25	R	-
	98:1-2	R	-
	99:24-25	R	-
	100:1-15	R	-
	151:16-25	R	-
	152:1-25	R	-
	153:1-22	R	-
	157:5-15	R	-
	165:9-15	-	165:16-167:19
	175:20-23	-	98:22-25, 157:16-22, 175:24-176:1-4
	178:7-25	R	184:3-6
	179:1-10, 22-25	R	184:3-6
	180:1-5	R	184:3-6
	184:7-20	R	-

Deponent and Deposition Date	Def. Designation	LULAC Pls' Objection	LULAC Pls' Counter Designation
	186:24-25	R	157:16-22
	187:1-11	R	157:16-22
	221:21-25	R	-
	222:1-18	R	-
	230:7-25	R	157:16-22
	231:1-9	R	157:16-22
	255:10-24	R, LC	-
Isabel Longoria (Apr. 20, 2022)	13:18-15	R	-
	14:1-13, 20-25	R	-
	15:1-25	R	-
	16:11-25	R	-
	17:1-25	R	-
	18:1-14	R	-
	19:7-25	R	-
	20:1-13, 19-20, 24-25	R	-
	21:1-25	R	-
	22:1-24	R	-
	25:16-19	R	29:21-30:3, 30:8-31:21,
	29:14-20	-	29:21-30:3, 30:8-31:21, 37:14-38:24
	30:4-7	-	27:18-28:2, 30:8-31:21, 37:14-38:24
	31:25	R	-
	32:1-19	R	33:25-34:14
	33:20-24	-	33:25-34:14
	34:25	R	-
	35:1-10	R	-
	36:9-14	R	35:11-36:8
	48:11-23	-	48:24-49:18
	50:22-25	-	51:12-52:19
	51:1-11	-	51:12-52:19
	52:22-25	R	-
	53:1-3	R	-
	61:13-17	-	60:17-61:12
	63:11-25	R	-
	64:1-5, 22-24	R, VA	-
	65:8-14	R, VA	-
	66:15-19, 24-25	VA	-
	69:22-25	R	-
	70:1-3, 23-25	R	69:11-15, 71:23-72:25, 73:4-74:8
	71:1-22	VA	71:23-72:25, 73:4-74:8
	73:1-3	R	-
	74:20-25	R	-
	75:1-8	R, VA	-
	82:18-23	-	81:25-82:8
	86:16-22	-	86:12-15, 86:23-88:14
	93:7-20	R, IO	-
	99:3-11, 25	-	99:12-24
	101:1-8	R, VA	-
	102:5-13, 21-25	R	-
	103:1-19	R	-

Deponent and Deposition Date	Def. Designation	LULAC Pls' Objection	LULAC Pls' Counter Designation
	104:3-14, 23-25	R	105:11-106:6, 109:15-110:12, 114:5-16
	105:1-5	R	105:11-106:6, 109:15-110:12, 114:5-16
	106:7-19	R	105:11-106:6, 109:15-110:12, 114:5-16
	107:9-25	R	105:11-106:6, 109:15-110:12, 114:5-16
	108:1-18	R	105:11-106:6, 109:15-110:12, 114:5-16
	111:3-25	R	105:11-106:6, 109:15-110:12, 114:5-16
	112:1-3	R	105:11-106:6, 109:15-110:12, 114:5-16
	114:22-25	R	105:11-106:6, 109:15-110:12, 114:5-16
	115:1-12, 15-25	R	105:11-106:6, 109:15-110:12, 114:5-16
	116:1-13, 16-22	R	105:11-106:6, 109:15-110:12, 114:5-16
	119:2-25	R	-
	120:1-25	R	-
	121:1-17, 20-25	R	-
	122:1-7, 17-25	R	122:12-16
	123:10, 16-18, 23-25	R	123:1-9
	124:1-14	R, PK	-
	125:3-5, 10-25	R, PK	-
	132:14-25	-	133:2-20
	133:1	-	133:2-20
	134:4-14	-	134:15-135:8
	135:9-18	-	135:19-136:21
	137:13-25	-	138:9-139:13
	138:1-2	-	138:9-139:13
	139:14-25	-	140:13-23
	140:1-12	-	140:13-23
	141:21-25	-	142:6-8
	142:1-5, 9-25	-	142:6-8
	144:1-5, 8-25	IO	-
	145:1-16, 19-25	IO	-
	146:1-25	IO	-
	147:1-5	-	147:6-148:1
	149:1-25	PK	150:2-6
	150:1, 7-25	PK, VA	150:2-6, 151:24-153:25
	151:1-23	-	151:24-153:25
	154:1-14	-	154:15-155:6
	155:7-13, 25	-	154:15-155:6, 155:14-24, 54:25-55:23
	156:1-7	R	54:25-55:23
	158:24-25	PK	-
	159:1-9, 17-25	IO, LC	160:3-161:2
	160:1-2	LC	160:3-161:2

Deponent and Deposition Date	Def. Designation	LULAC Pls' Objection	LULAC Pls' Counter Designation
Isabel Longoria (Apr. 22, 2022)	79:17	R, VA	-
	99:1-8	VA	-
	107:2-22	-	107:23-108:22
	108:23-25	-	107:23-108:22
	109:1-8	-	109:9-111:1
	118:1-7	-	119:1-12
Objections and Counter Designations to Intervenor-Defendants' Designations			
Susan Fountain (Apr. 26, 2023)	69:17-70:8	R	-
	72:11-73:4	R	-
	73:17-75:24	R	-
	101:10-17	LC	101:10-105:3
	112:23-113:2	-	112:10-12; 112:23-25; 113:1-114:2
	114:3-15	-	112:10-12; 112:23-25; 113:1-114:2
	117:9-23	R	115:4-117:8; 117:24-118:4
	118:5-21	R	115:4-117:8; 117:24-118:4
	122:4-22	R	122:23-123:12
	123:13-124:2	R	122:23-123:12
	160:2-161:8	R	-
Alan Vera (February 27, 2023)	25:1-14	-	24:23-25
	35:12-18	-	34:25-35:11, 35:19-36:1
	56:5-58:3	-	55:8-25, 58:4-6
	71:10-72:11	H	-
	72:17-24	VA	72:25-73:9
	73:10-74:13	PK	74:14-20
	85:5-15	PK	-
	90:3-93:10	PK, IO	-
	105:21-106:9	PK	-
	106:22-112:12	PK, IO	-
	143:18-144:2	-	143:8-17
Cindy Siegel (Feb. 28, 2023)	26:22-28:9	H, PK	-
	55:25-56:18	BER	-
	57:4-58:11	BER	56:19-57:3
	62:15-63:11	PK, IO, R	-
	91:6-95:15	H	-
	97:4-13	-	97:14-18; 98:12-99:4
	99:23-100:9	R	-
	103:1-103:9	R, PK	-
Objections and Counter Designations to Defendants Ogg's Designations			
Isabel Longoria (April 20, 2022)	9:22-10:5	-	10:17-11:3, 133:2-20
	139:14-140:18	R	-
Carol Alvarado (Oct. 6, 2022)	190:14-25	-	190:5-13, 191:1-4

Dated: August 15, 2023

Respectfully submitted,

/s/ Uzoma N. Nkwonta
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CERTIFICATE OF SERVICE

On August 15, 2023, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Western District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all parties electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Uzoma N. Nkwonta
Uzoma N. Nkwonta